

# Exhibit O

Page 1

HEADWATER RESEARCH, LLC,

REMOTE VIDEOTAPED DEPOSITION

STENOGRAPHICALLY REPORTED BY:

Alireza Raissinia – December 15, 2023

2 (Pages 2 to 5)

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APPEARANCES

(All participants appearing remotely)

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Appeared on behalf of the Deponent.

ALSO PRESENT:

Greg Raleigh, Headwater

Steve DeCanio, videographer

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EXHIBIT

DESCRIPTION

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Exhibit 1

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Raissinia

Exhibit 2

European patent, Patent

31

No. EP2215873

Exhibit 3

US Patent No. 8,856,798

39

Exhibit 4

Provisional Application No.

41

61/405,603

Exhibit 5

Headwater Partners

58

Consulting Agreement,

HW\_00053593-604

Exhibit 6

US Patent No. 9,277,433,

75

HW\_00005741

Exhibit 7

Consulting Agreement dated

94

July 1, 2010, HW\_00055178

Exhibit 8

US Provisional Patent

108

Application No. 61/348,022

Exhibit 9

US Provisional Patent

114

Application No. 61/206,354

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EXAMINATION

Witness

Page

Line

ALIREZA RAISSINIA

By Mr. Hartzman

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By Mr. Mirzaie

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THE VIDEOGRAPHER: We are on the record.

This is the remote video-recorded deposition of

Alireza Raissinia.

Today is Friday, December 15, 2023.

The time is now 9:02 a.m. Pacific time.

We are here in the matter of

Headwater Research versus Samsung Electronic

Company, Limited.

The court reporter is JoAnn Losoya,

the videographer is Steve DeCanio, and both are

representatives of Gregory Edwards Court Reporter.

All counsel will be noted on the

stenographic record.

The court reporter will please

administer the oath.

(Witness sworn at 9:03 a.m.)

MR. HARTZMAN: This is Jared Hartzman

from Fish & Richardson representing the Samsung

defendants. And with me today is my colleague Thad

Kodish.

MR. MIRZAIE: This is Reza Mirzaie

representing the plaintiff Headwater. With me today

is my colleague Jason Wietholter. Also from the

client is Greg Raleigh.

MR. KAYS: Good morning. This is David

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17 (Pages 62 to 65)

<p style="text-align: right;">Page 62</p> <p>1 you -- can you answer the question? That's --</p> <p>2 that's -- that's the line I'm drawing as your</p> <p>3 counsel.</p> <p>4 BY THE WITNESS:</p> <p>5 A. My best guess would be yes, I did talk to</p> <p>6 at least maybe one person, if not more.</p> <p>7 Q. Do you recall who that one person was?</p> <p>8 A. Yeah, my best guess would be VK Jones.</p> <p>9 Q. Did you say DK or VK?</p> <p>10 A. VK. His name is Vincent Knoll Jones.</p> <p>11 Q. You said Vincent Knoll?</p> <p>12 A. Knoll, K-N-O-L-L. It stands for VK.</p> <p>13 Q. Who else at Qualcomm other than attorneys</p> <p>14 would you have told about your work for Headwater</p> <p>15 before you left Qualcomm?</p> <p>16 A. Sorry. Attorneys? I didn't talk to any</p> <p>17 attorneys.</p> <p>18 Q. No. Besides attorneys?</p> <p>19 A. Oh. I don't -- I mean, I would be</p> <p>20 guessing. I don't remember.</p> <p>21 Q. If you had to guess, who would you have</p> <p>22 contacted at Qualcomm other than attorneys?</p> <p>23 MR. KAYS: Objection, calls for</p> <p>24 speculation. No foundation.</p> <p>25</p>	<p style="text-align: right;">Page 64</p> <p>1 about it.</p> <p>2 Q. Did Vincent Knoll join you at Headwater?</p> <p>3 A. No.</p> <p>4 Q. He stayed at Qualcomm?</p> <p>5 A. Correct.</p> <p>6 Q. Is he still at Qualcomm?</p> <p>7 A. Correct.</p> <p>8 Q. What knowledge or experience do you</p> <p>9 believe you had to help you get a job at Headwater?</p> <p>10 A. I guess my knowledge of wireless LAN, my</p> <p>11 knowledge of data networking, and the fact I was</p> <p>12 involved in innovations and solutions in general,</p> <p>13 wireless solutions.</p> <p>14 Q. Why do you believe that expertise would</p> <p>15 have been useful at Headwater?</p> <p>16 A. I felt it was useful, but I wasn't sure</p> <p>17 that it was adequate because Headwater was pretty</p> <p>18 broad in many technologies, but it was useful</p> <p>19 because it covers -- it covered this segment of</p> <p>20 wireless communications, wireless LAN communication,</p> <p>21 anything to do with networking, things like that.</p> <p>22 But it also intended to be much, much more broad</p> <p>23 than just only was wireless communications. So it</p> <p>24 was adequate to that degree. It wasn't</p> <p>25 necessarily -- it was reasonable to that degree, but</p>
<p style="text-align: right;">Page 63</p> <p>1 BY THE WITNESS:</p> <p>2 A. Again, I would be guessing. Dave Johnson</p> <p>3 was already there.</p> <p>4 Q. Was Dave Johnson at Qualcomm before he</p> <p>5 left to join Headwater?</p> <p>6 A. Right.</p> <p>7 Q. Did you work with Dave Johnson at</p> <p>8 Qualcomm before he left to work for Headwater?</p> <p>9 A. Not at Qualcomm. Again he -- yeah, not</p> <p>10 at Qualcomm. He was in San Diego.</p> <p>11 Q. Where did you work with Dave Johnson</p> <p>12 before Headwater?</p> <p>13 A. I worked with Dave Johnson at Clarity</p> <p>14 Wireless as well as Airgo networks.</p> <p>15 Q. Okay. What did you tell Vincent Knoll</p> <p>16 about leaving Qualcomm to go Headwater before you</p> <p>17 left Qualcomm?</p> <p>18 MR. KAYS: No foundation.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I mean, obviously I explained to him the</p> <p>21 exchange I had with Greg as far as this new company</p> <p>22 and showed him that I'm excited to join him.</p> <p>23 Q. Anything else?</p> <p>24 A. I must have also tried to excite him to</p> <p>25 join with me, but that's all I can say. That's</p>	<p style="text-align: right;">Page 65</p> <p>1 it wasn't necessarily adequate for everything that</p> <p>2 Headwater was going to try to do.</p> <p>3 Q. Before joining Headwater, were you aware</p> <p>4 that they were going to be doing work in wireless</p> <p>5 local area network communication and networking?</p> <p>6 MR. MIRZAI: Objection, form.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Of course. If I couldn't contribute to</p> <p>9 the work, then it makes no sense for me to even</p> <p>10 join. It had to be.</p> <p>11 Q. Prior to your work at Headwater, what</p> <p>12 experience did you have working with networking in</p> <p>13 smartphones or other smart devices?</p> <p>14 A. I really didn't have very much</p> <p>15 experience. Again, I was mostly on the wireless</p> <p>16 communication -- primarily it was wireless LAN and</p> <p>17 media access control, which is lower layer, nothing</p> <p>18 to do with applications.</p> <p>19 Q. What is media access control?</p> <p>20 A. Media access control is a layer between</p> <p>21 essentially layer 3 in the data networking, layer 3.</p> <p>22 Media access control is layer 2. Somewhere in</p> <p>23 between layer 3 and -- layer 1 is a physical layer,</p> <p>24 which essentially sends the DAS communication over</p> <p>25 that physical layer. Layer 2 is the media access</p>

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18 (Pages 66 to 69)

<p style="text-align: right;">Page 66</p> <p>1 control.</p> <p>2 Q. When you say layer, are you talking about</p> <p>3 OSI stack?</p> <p>4 A. You could refer to that, yeah, exactly.</p> <p>5 Q. After joining Headwater as a consultant,</p> <p>6 what would you say your role was?</p> <p>7 A. My role was to work closely with Greg in</p> <p>8 creation of the innovations that we were -- this</p> <p>9 organization Headwater was planning to do. Of</p> <p>10 course, primarily I worked with Headwater I and so I</p> <p>11 jumped in and started reviewing some of the work</p> <p>12 that Greg has done, which was extensive, and get in</p> <p>13 there and then obviously my work became more</p> <p>14 extensive as I worked with him closely for other</p> <p>15 ideas.</p> <p>16 Q. When you say Headwater I, are you</p> <p>17 referring to Headwater Partners I?</p> <p>18 A. Right.</p> <p>19 Q. So what would you say was your day-to-day</p> <p>20 role, was it just brainstorming with Greg Raleigh?</p> <p>21 MR. KAYS: Vague as to time.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Brainstorming was one part of it, of</p> <p>24 course. Reviewing documents and interacting with</p> <p>25 the patent lawyers.</p>	<p style="text-align: right;">Page 68</p> <p>1 many times with Greg involved, yeah.</p> <p>2 Q. And so you were reviewing claims for the</p> <p>3 various patent applications being filed while you</p> <p>4 were at Headwater?</p> <p>5 MR. MIRZAIE: I'll just go ahead and</p> <p>6 object to the extent that it calls for privileged</p> <p>7 communications with your lawyers at the time on this</p> <p>8 subject. You can answer yes or no to the question,</p> <p>9 were you reviewing claims for various patent</p> <p>10 applications being filed.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Right, I was reviewing, yes. Obviously,</p> <p>13 reviewing claims meaning broad claims, independent</p> <p>14 claims, so many things.</p> <p>15 Q. Aside from brainstorming, innovations,</p> <p>16 and reviewing documents and interacting with the</p> <p>17 patent lawyers, did you have any other day-to-day</p> <p>18 tasks in your work for Headwater?</p> <p>19 A. No, I would say -- it was hard to</p> <p>20 distinguish because also since ItsOn or the</p> <p>21 development team was also working on creation of an</p> <p>22 idea into a product, I was also involved in</p> <p>23 discussions with -- occasionally with designers.</p> <p>24 Q. On the ItsOn side?</p> <p>25 A. Yeah, I would say I was, but I won't say</p>
<p style="text-align: right;">Page 67</p> <p>1 Q. For patent prosecution purposes?</p> <p>2 A. First, for patent creation and then --</p> <p>3 and if there were issues came out of the patent</p> <p>4 office that there were concerns to review and take a</p> <p>5 look and see the concerns item -- the concern items.</p> <p>6 I also worked on making sure that the innovations</p> <p>7 can withstand on its own to be a new innovation. So</p> <p>8 that reviewing and ensuring that -- working closely</p> <p>9 the patent lawyers that the claim text can stand on</p> <p>10 its own and, of course, like any creation of a</p> <p>11 patent, trying to make sure that the claim is as</p> <p>12 broad as can be so we can get best coverage.</p> <p>13 Q. And so you were involved in prosecuting</p> <p>14 your patents while working at Headwater?</p> <p>15 A. I don't know what you mean by</p> <p>16 prosecuting. I wasn't prosecuting it with any -- I</p> <p>17 mean, we were not in any litigation or anything.</p> <p>18 Q. I see. I see where the confusion is.</p> <p>19 Prosecution is just a term of art for lawyers when</p> <p>20 it comes to applying for patents with the patent</p> <p>21 office.</p> <p>22 So you were involved in the back and</p> <p>23 forth with the patent office in terms of getting the</p> <p>24 patent?</p> <p>25 A. Together with the patent lawyer and also</p>	<p style="text-align: right;">Page 69</p> <p>1 that you can consider that as a Headwater work. It</p> <p>2 was more of a support to ensure that -- that's the</p> <p>3 kind of thing. Yeah, I worked on it. Primarily, my</p> <p>4 focus was on Headwater doing -- working on the</p> <p>5 claims, patents, new innovations, working with</p> <p>6 patent lawyers, and dealing with stuff coming up out</p> <p>7 of the PTO office, and No. 1 goal is to make all the</p> <p>8 independent claims as broad as possible. If we</p> <p>9 can't, then we go down more specific and see how far</p> <p>10 we can get in.</p> <p>11 Q. When you say making independent claims as</p> <p>12 broad as possible, what do you mean by that?</p> <p>13 MR. MIRZAIE: I'll -- go ahead. I'll</p> <p>14 just -- go ahead.</p> <p>15 MR. KAYS: Hold on, Ali.</p> <p>16 MR. MIRZAIE: Sorry about that. I'll go</p> <p>17 ahead and object to the extent that it's calling for</p> <p>18 privileged communications with counsel or the</p> <p>19 subject of communications that he had with patent</p> <p>20 prosecution counsel at the time, and I think this</p> <p>21 does get into that topic. So I'm going to instruct</p> <p>22 not to answer based on that.</p> <p>23 And specifically, if he could answer</p> <p>24 what he meant by broad as possible without divulging</p> <p>25 anything he discussed with patent prosecution</p>

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36 (Pages 138 to 141)

<p style="text-align: right;">Page 138</p> <p>1 Q. Right. And all throughout that whole 2 process, you worked with Greg Raleigh, correct? 3 A. Correct. 4 Q. And I think you testified earlier today 5 that when you joined Headwater, when you first 6 joined Headwater, up to that point at Qualcomm, you 7 had never worked on app control. 8 Do you remember that? 9 A. Correct. 10 MR. HARTZMAN: Objection, misstates 11 testimony. 12 BY MR. MIRZAI: 13 Q. You had never worked on app or mobile app 14 access to network resources at Qualcomm before that 15 point, correct? 16 A. Correct. I never worked on it. 17 Q. You hadn't worked on determining whether 18 an app is in the background or the foreground and 19 what kind of connection it would have, correct? 20 A. Correct. 21 Q. In fact, up to that point, you hadn't 22 heard of device assisted services, correct? 23 A. Correct. I would say correct, yeah. 24 Q. And so if Samsung were to tell the jury 25 that these Headwater inventions were all conceived</p>	<p style="text-align: right;">Page 140</p> <p>1 that. We wanted -- he highlighted that and I 2 resonated, that that structure makes sense to me. 3 So I wanted to join him. 4 Q. Right. And I think you had testified 5 earlier that maybe if it was someone else that 6 called you to leave Qualcomm -- 7 A. Yeah. 8 Q. -- you would disagree? 9 A. Yeah. It would have to be Greg. Anyone 10 else probably I would just think of it as another 11 recruiter is trying to get my attention and I would 12 just ignore it. 13 Q. But for Greg -- well, in your opinion 14 working with Greg for so long, Greg is a great 15 innovator, correct? 16 A. Oh, totally. No doubt in my mind. He's 17 one of the -- as far as innovation, he's unique. I 18 worked with a lot of people, and he's amongst the 19 top ones, if not top. I work with a few here, and 20 he's amongst that. 21 Q. You have worked with dozens of people, if 22 not hundreds, at Qualcomm and other companies, 23 correct? 24 A. Yeah. I mean, I'm involved IEEE standard 25 activity, which is a pool of brain in innovation of</p>
<p style="text-align: right;">Page 139</p> <p>1 prior to leaving Qualcomm, that would be absolutely 2 false, right? 3 MR. HARTZMAN: Objection. Vague and 4 leading. 5 BY THE WITNESS: 6 A. From my perspective, it would be false 7 because I don't know anything about it. 8 Q. From your perspective, I believe you 9 testified earlier that when Greg had called you, you 10 were -- Strike that. 11 When Greg contacted you about 12 discussing ItsOn, you two had either one or two 13 meeting or lunches, do you recall that? 14 MR. HARTZMAN: Objection, vague. 15 BY THE WITNESS: 16 A. Again, it was -- I think -- I know it was 17 Headwater first was doing more of the innovation 18 work, and again, the structure appealed to me 19 because the structure and the plan was to create 20 innovation and also have companies use that 21 innovation to make a product. 22 The distaste we had was that when we 23 were acquired by Qualcomm, our technology was taken, 24 and it wasn't really used properly in a sense of in 25 our -- the value that we had in it. We didn't want</p>	<p style="text-align: right;">Page 141</p> <p>1 wireless and wireless LAN. So many individuals. So 2 I know -- I mean, from my perspective, Greg is still 3 on top to me -- for me because I really enjoyed 4 working with him. 5 Q. Why do you consider Greg one of the top 6 innovators? 7 A. Well, his brain works -- he's very 8 bright. His brain works uniquely the way he 9 approaches a problem. 10 Q. How so? 11 A. I think he also -- I'm hoping he also 12 thought that I'm able to stay at his same pace, at 13 least at the same pace, maybe not exactly the same 14 pace. So he approached me and found that I could be 15 actually a good contributor and together we can just 16 make things happen. That's the reason he approached 17 me, and I enjoyed working with him. 18 Q. When he did approach you, you were I 19 think to quote your earlier testimony excited to 20 join, fair? 21 A. Yeah. Of course after he explained what 22 he was planning to do, it got me excited, yeah. 23 Q. After you had joined, you also did some 24 related work for the early development of a company 25 called ItsOn that we discussed earlier today.</p>